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Official Committee of Unsecured Asbestos Claimants

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

	X	
In re:	:	
	:	
STATE INSULATION	:	CASE NO. 11-15110 (MBK)
CORPORATION,	:	
	:	
Debtor.	:	Chapter 11
4	X	

VERIFIED APPLICATION TO APPROVE EMPLOYMENT OF GREENBAUM, ROWE, SMITH & DAVIS, LLP, AS ATTORNEYS FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS

TO: THE HONORABLE MICHAEL B. KAPLAN UNITED STATES BANKRUPTCY JUDGE FOR THE DISTRICT OF NEW JERSEY:

The Application of Official Committee of Unsecured Asbestos Claimants ("ACC"), appointed March 10, 2011 herein respectfully represents as follows:

1. On February 23, 2011, the captioned debtor, State Insulation Corporation, (the "Debtor") filed a voluntary petition under Title 11, Chapter 11, United States Code (the "Bankruptcy Code").

- 2. The ACC desire that Greenbaum, Rowe, Smith & Davis, LLP (GRSD") be retained as attorneys for the Debtor's case <u>nunc pro tunc</u> to March 10, 2011, the date GRSD commenced representing the ACC.
- 3. The Committee selected GRSD as its attorneys primarily because of the Firm's experience and expertise in matters of this character and because the ACC believes that the firm is particularly qualified to represent the Committee in these proceedings.
 - 4. The professional services that GRSD will render are as follows:
 - a. To give legal advice with respect to the ACC's duties in this case;
 - b. To assist in the investigation of the acts, conduct, assets, liabilities and financial condition of the Debtor and any other matters relevant to these proceedings;
 - c. To prosecute any appropriate adversary proceedings; and
 - d. To perform such other legal services as may be referred and be in the best interests of the ACC.
- 5. To the best of the ACC's knowledge, GRSD neither represents any other party in connection with this case nor holds or represents any interest adverse to the Debtor or its creditors and is a "disinterested person" pursuant to Section 101(14) of the Code.
 - 8. No previous application for the relief requested herein has been made to this Court.

WHEREFORE, the ACC prays that the Court approve the employment of the firm of Greenbaum, Rowe, Smith & Davis, LLP under a general retainer, to represent the ACC in this

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case under Chapter 11 of the Bankruptcy Code, and that it grant such other and further relief as is

just and proper.

DEIRDRE WOULFF PACHECO

CHAIRPERSON OF THE OFFICIAL

COMMITTEE OF UNSECURED

ASBESTOS CLAIMANTS

Dated: March 16, 2011

VERIFICATION PURSUANT TO 28 U.S.C. §1746

I, DEIRDRE WOULFE PACHECO, hereby certify under penalty of perjury that I have read the foregoing Application and the statements contained therein are true to the best of my knowledge, information and belief.

DEIRDRE WOULFE PACHECO CHAIRPERSON OF THE OFFICIAL COMMITTEE OF UNSECURED ASBESTOS CLAIMANTS

DATED: March 16, 2011